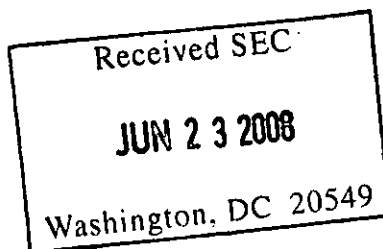


Paras Madhu
Director
Securities Operations

NYSE Group



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New York, New York 10005
t 212.656.5026 | f 212.656.5893
pmadho@nyse.com



08052324

June 23, 2008

CERTNYS
001-11302

Ms. Velma T. Smith
Branch Chief
Securities and Exchange Commission
Branch of Filer Support 2
Room 2531
100 F Street, NE
Washington, DC 20549

Dear Ms. Smith:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, KeyCorp, 7.750% Non-Cumulative Perpetual Convertible Preferred Stock, Series A and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on June 23, 2008. Tentative listing date – Not yet determined.

Sincerely,

A handwritten signature in black ink, appearing to read "Paras Madhu".

PROCESSED

JUN 25 2008

THOMSON REUTERS

END